

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRIDGESTONE SPORTS CO., LTD., and
BRIDGESTONE GOLF, INC.,

Plaintiffs,

v.

ACUSHNET COMPANY,

Defendant.

C.A. No. 05-132 (JJF)

**REDACTED –
PUBLIC VERSION**

DECLARATION OF JOHN K. SHIN

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

Jack B. Blumenfeld (#1014)

Maryellen Noreika (#3208)

Leslie A. Polizoti (#4299)

1201 N. Market St.

P.O. Box 1347

Wilmington, DE 19801

(302) 658-9200

*Attorneys for Bridgestone Sports Co., Ltd.
and Bridgestone Golf, Inc.*

OF COUNSEL:

Robert M. Masters

Scott M. Flicker

Terrance J. Wikberg

Brandon M. White

PAUL, HASTINGS, JANOFSKY & WALKER LLP

875 15th St., N.W.

Washington, DC 20005

(202) 551-1700

Original Filing Date: April 9, 2007

Redacted Filing Date: April 10, 2007

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DECLARATION OF JOHN K. SHIN

I, John K. Shin, hereby declare:

1. I am an associate at the law firm of Paul, Hastings, Janofsky & Walker LLP ("Paul Hastings").

2. I am one of the attorneys at Paul Hastings who is involved in the pending litigation, and I have been admitted *pro hac vice* before this Court.

3. Paul Hastings represents the plaintiffs Bridgestone Sports Co., Ltd. and Bridgestone Golf, Inc. ("Bridgestone") in this case. I make this declaration in support of *Bridgestone's Reply Brief in Support of Its Motion for Sanctions*.

4. Bridgestone's U.S. Patent # 6,634,961 ("the '961 Patent") issued on October 21, 2003. Bridgestone accused Acushnet's Pro V1 golf ball bearing sidestamp ◀Pro V1-392▶ of infringing claim 2. This claim describes a core recipe listing several core materials, as well as a blend of two rubbers.

5. In order to accuse the earlier Pro V1 golf ball bearing the sidestamp ◀●Pro V1 392●▶ of infringement, one must know the entire core recipe for that particular golf ball. Specifically, one must know the presence and amount of all of the core materials identified in

claims 1 and 2 of the '961 Patent – for example polybutadiene (a), diene rubber (b), unsaturated carboxylic acid or a metal salt thereof, organosulfur compound, inorganic filler and organic peroxide – which are more than simply the presence and amount of two rubbers. [REDACTED]

[REDACTED]

6. I have reviewed the documents bearing bates stamp numbers AB 14630, AB 14633, AB 14636-37, AB 14641, AB 14674, AB 14681, AB 14698, AB 14701, AB 14830, AB 14850-51, AB 14854 and AB 14860, identified by Acushnet in their brief in opposition (D.I. 323), [REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

8. In addition, the cited recipe change notices fail to point to any changes within the relevant time period of October 21, 2003 through December 2004. [REDACTED]

[REDACTED]


9. [REDACTED]

[REDACTED]

10. [REDACTED]

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 9, 2007



John K. Shin

CERTIFICATE OF SERVICE

I certify that on April 10, 2007, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to Richard L. Horwitz.

I further certify that I caused copies to be served upon the following on April 10, 2007 in the manner indicated:

BY HAND & E-MAIL

Richard L. Horwitz, Esquire
POTTER ANDERSON & CORROON LLP
1313 N. Market Street
Wilmington, DE 19801

BY E-MAIL and FEDERAL EXPRESS

Joseph P. Lavelle, Esquire
HOWREY LLP
1299 Pennsylvania Avenue, NW
Washington, DC 20004

/s/ Leslie A. Polizoti
Leslie A. Polizoti (#4299)
MORRIS, NICHOLS, ARSHT & TUNNELL LLP
Wilmington, DE 19801
(302) 658-9200
lpolizoti@mnat.com

EXHIBIT A

REDACTED